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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
EM LTD. and NML CAPITAL, LTD.,	:	
	:	06 Civ. 7792 (TPG)
<i>Plaintiffs,</i>	:	
	:	
- against -	:	
	:	
BANCO CENTRAL DE LA REPÚBLICA	:	
ARGENTINA and THE REPUBLIC OF	:	
ARGENTINA,	:	
	:	
<i>Defendants.</i>	:	
-----X	:	
(Additional case captions on next two pages)	:	
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**BANCO CENTRAL DE LA REPÚBLICA ARGENTINA'S  
CROSS-MOTION TO VACATE AND QUASH *EX PARTE* ORDERS**

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VARIOUS ACTIONS	:	02 Civ. 1773 (TPG)
	:	02 Civ. 3804 (TPG)
	:	02 Civ. 3808 (TPG)
	:	02 Civ. 4124 (TPG)
	:	03 Civ. 1680 (TPG)
	:	03 Civ. 2507 (TPG)
	:	03 Civ. 4693 (TPG)
	:	03 Civ. 6268 (TPG)
	:	03 Civ. 8120 (TPG)
	:	03 Civ. 8845 (TPG)
	:	03 Civ. 9538 (TPG)
	:	04 Civ. 3314 (TPG)
	:	04 Civ. 6137 (TPG)
	:	04 Civ. 6594 (TPG)
	:	04 Civ. 7504 (TPG)
	:	05 Civ. 177 (TPG)
	:	05 Civ. 178 (TPG)
	:	05 Civ. 2434 (TPG)
	:	05 Civ. 2943 (TPG)
	:	05 Civ. 3089 (TPG)
	:	05 Civ. 3955 (TPG)
	:	05 Civ. 4085 (TPG)
	:	05 Civ. 4299 (TPG)
	:	05 Civ. 4466 (TPG)
	:	05 Civ. 5197 (TPG)
	:	05 Civ. 6002 (TPG)
	:	05 Civ. 6200 (TPG)
	:	05 Civ. 6599 (TPG)
	:	05 Civ. 8195 (TPG)
	:	05 Civ. 8687 (TPG)
	:	05 Civ. 10636 (TPG)
	:	06 Civ. 207 (TPG)
	:	06 Civ. 3196 (TPG)
	:	06 Civ. 3197 (TPG)
	:	06 Civ. 3198 (TPG)
	:	06 Civ. 6032 (TPG)
	:	06 Civ. 6466 (TPG)
	:	06 Civ. 7100 (TPG)
	:	07 Civ. 98 (TPG)
	:	07 Civ. 689 (TPG)
	:	07 Civ. 937 (TPG)
	:	07 Civ. 1910 (TPG)
	:	07 Civ. 2690 (TPG)

: 07 Civ. 2693 (TPG)  
 : 07 Civ. 2715 (TPG)  
 : 07 Civ. 5807 (TPG)  
 : 07 Civ. 6563 (TPG)  
 : 07 Civ. 7248 (TPG)  
 : 07 Civ. 10656 (TPG)  
 : 07 Civ. 10657 (TPG)  
 : 07 Civ. 11327 (TPG)  
 : 07 Civ. 11382 (TPG)  
 : 07 Civ. 11495 (TPG)  
 : 07 Civ. 11497 (TPG)  
 : 08 Civ. 440 (TPG)  
 : 08 Civ. 2541 (TPG)  
 : 08 Civ. 3302 (TPG)  
 : 08 Civ. 4902 (TPG)  
 : 08 Civ. 5436 (TPG)  
 : 08 Civ. 6625 (TPG)  
 : 08 Civ. 6978 (TPG)  
 : 09 Civ. 1707 (TPG)  
 : 09 Civ. 1708 (TPG)  
 : 09 Civ. 8275 (TPG)  
 : 09 Civ. 8299 (TPG)  
 : 09 Civ. 8757 (TPG)  
 : 09 Civ. 10620 (TPG)

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Banco Central de la República Argentina (“BCRA”), through its counsel, hereby moves the Court, pursuant to Rules 64 and 69 of the Federal Rules of Civil Procedure, articles 52 and 62 of the New York Civil Practice Law and Rules, and the Foreign Sovereign Immunities Act, 28 U.S.C. §§ 1602 *et seq.*, for an Order vacating the attachment orders, “Restraining Orders” and “Omnibus Orders,” and quashing the writs of execution (collectively, the “*Ex Parte* Orders”), that were issued on January 11 and 12, 2010 directed to BCRA’s property, and the orders issued thereafter providing substantially similar relief.

The *Ex Parte* Orders should be vacated and quashed for the reasons set forth in BCRA's Memorandum of Law (1) in Opposition to Plaintiffs' Motions to Confirm Attachment Orders and (2) in Support of Cross-Motion to Vacate All *Ex Parte* Orders, accompanying this motion, the Declaration of Michael J. Ushkow, executed on March 26, 2010, and BCRA's other submissions in these actions.

WHEREFORE, BCRA respectfully requests entry of an order (1) granting the relief requested herein in substantially the form of the Proposed Order, attached hereto as Exhibit A, and (2) granting BCRA such other and further relief as the Court deems just.

Dated: New York, New York  
March 26, 2010

/s/Joseph E. Neuhaus  
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